

**Federal Defenders
OF NEW YORK, INC.**

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 8, 2023

BY ECF & E-MAIL

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

22-cr-526 (NSR)

Re: *United States v. Ysenni Gomez*, 22-cv-6668

Dear Honorable Judge Román:

I write for two reasons: first, to request an adjournment of the status conference currently scheduled before Your Honor on February at 10 a.m. for 60 days; and second, to request a modification of Ms. Gomez's release conditions as detailed below.

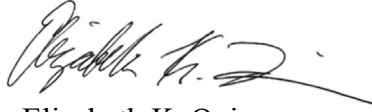
The parties were last before the Court on October 28, 2022, for an initial appearance. Thereafter, the government produced the first batch of discovery on December 2, 2022. Subsequent productions were made on December 19, 2022, December 29, 2022, and January 13, 2023. A final batch of discovery was mailed out on January 26, 2023, which contained a terabyte of data and included a Cellebrite extract of a cellular telephone. Given the recent production of voluminous discovery, I require additional time to review these materials and discuss them with my client. In addition, many of the text messages produced are in Spanish and not all have translations to English. Therefore, I am requesting 60 additional days to review these materials and would consent to the exclusion of time under the Speedy Trial Act.

Ms. Gomez has been out on release conditions since October 7, 2022, when she satisfied all the bond conditions. She has been fully compliant with all her release conditions. She is currently under home detention. She is requesting a modification that would permit her to put her son on the bus in the mornings and pick him up in the afternoons. The bus stop is approximately 2-3 blocks from her home. She is requesting that she be permitted to put him on the bus Monday through Friday at 6:40 a.m. and pick him up Monday through Thursday at 4:30 p.m. and on Fridays at 1:30 p.m. Ms. Gomez would be leaving her home to complete this task and immediately returning home. I have consulted with Ms. Gomez's Pre-Trial Services officer who does not object to this request. I have also consulted with the government through Assistant United States Attorney Kaiya Arroyo who does not object to either request.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/8/2023

Ms. Gomez respectfully requests Your Honor adjourn the case for 60 days and amend her release conditions as noted above.

Sincerely,



Elizabeth K. Quinn
Assistant Federal Defender
Counsel for Ysenni Gomez

cc: Kaiya Arroyo, AUSA

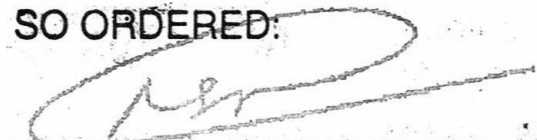
Deft's first request to adjourn the Status Conf. from Feb. 14, 2023 until Apr. 25, 2023 at 10:00 am is GRANTED without objection by the Gov't. The conference is converted from in-person to telephonic.

Deft's second request seeking bail modification to permit her to escort her sons to the school bus stop in the a.m. and pick up in the p.m. as outlined above is GRANTED without objection by the Gov't and the Pretrial Services Officer. Deft. is directed to return home immediately after drop off and pick up.

Clerk of Court is requested to terminate the motion at ECF No. 20.

**Dated: White Plains, NY
February 8, 2023**

SO ORDERED:


**HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE**